

1 ROBERT W. LYONS (45548)

2 LAW OFFICES OF ROBERT W. LYONS
295 West Winton Avenue
3 Hayward, California 94544
4 Telephone (510) 782-6161
Facsimile (510) 782-3519

5 Attorney for Defendant
Armando Chavez-Chavez

7

8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE VENUE

12 UNITED STATES OF AMERICA,) Case No.: CR 11-00285 EJD
13 Plaintiff,)
14 vs.) STIPULATION AND [PROPOSED] ORDER
15 ARMANDO CHAVEZ-CHAVEZ,) TO CONTINUE SENTENCING HEARING
16 Defendant.)

17
18 The parties by and through their counsel of record, hereby stipulate to the following: The parties
have jointly agreed that the current sentencing hearing date of Monday, May 21, 2012 at 1:30
20 p.m. be continued until Monday, July 2, 2012 at 1:30 p.m. The reason for this continuance is
that defense counsel has recently encountered a vehicle burglary in which the suspect took his
calendar, briefcase and i-phone. This burglary caused defense counsel to have to rebuild and
reconstruct various matters and consequently he has not had an opportunity to see his client or
prepare objections to the presentence report. Defense counsel requires additional time to see
his client and prepare objections to the presentence report. Karen Mar, Probation Officer has
been notified of this request and has no objections to the continuance.

22
23
24 For the factual reason above, the parties agree that the sentencing hearing currently
25 scheduled for May 21, 2012 be continued to July 2, 2012.
26
27
28

1 Date: May 10, 2012
2
3

/s/Robert W. Lyons

Robert W. Lyons
Attorney for Armando Chavez-Chavez

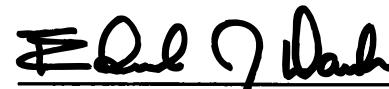
5 Date:

/s/Carolyne Sanin

Carolyne Sanin
Assistant United States Attorney

8 IT IS SO ORDERED.
9

10 Date: May 10, 2012



Honorable Edward J. Davila
United States District Judge